

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**AMERICAN ALLIANCE FOR EQUAL §  
RIGHTS §**

**Plaintiff, §**

**vs. §**

**CIVIL ACTION NO. 4:25-cv-00125-P**

**AMERICAN AIRLINES, INC.; QURIUM §  
SOLUTIONS, INC. (D/B/A SUPPLIER.IO) §**

**Defendants §**

**DEFENDANT AMERICAN AIRLINES, INC.’S UNOPPOSED  
MOTION TO EXTEND TIME TO FILE FIRST RESPONSIVE PLEADING**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE:

Pursuant to Federal Rule of Civil Procedure 6(b), Defendant American Airlines, Inc. (“American”) moves the Court for an extension of time for American to file its first responsive pleading to Plaintiff American Alliance for Equal Rights’ (“Plaintiff”) Complaint (“Complaint”), and would show as follows:

Plaintiff filed its Complaint on February 11, 2025. [Dkt. #1]. Pursuant to Federal Rule of Civil Procedure 4, Defendant American Airlines, Inc executed a Waiver of Service of Summons on February 12, 2025, [Dkt. #6]. American’s responsive pleading deadline is therefore April 14, 2025. *See* FED. R. CIV. P. 4(1) and 4(d)(F) (providing for a 60-day response deadline after the request for waiver of service was sent) and FED. R. CIV. P. 6(a)(1)(C) (but if the last day is a Saturday or Sunday, or legal holiday, the period continues to run until the end of the next day that is not a Saturday, Sunday, or legal holiday).

American requests an extension of time in order for American to complete its investigation into the allegations made in the Complaint and to file a first responsive pleading.

Plaintiff does not oppose the extension of time. American has not previously requested an extension of time. Therefore, good cause exists for this extension. American requests an extension until May 30, 2025 for American to file its first responsive pleading to the Complaint. An Order accompanies this Unopposed Motion under separate cover.

WHEREFORE, PREMISES CONSIDERED, Defendant American Airlines, Inc. moves the Court to grant this Unopposed Motion to Extend Time to File First Responsive Pleading, and asks the Court to sign the Order allowing American until May 30, 2025, to file its first responsive pleading to Plaintiff's Complaint.

Respectfully submitted,

/s/ Russell D. Cawyer

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**ATTORNEY FOR DEFENDANT  
AMERICAN AIRLINES, INC.**

**CERTIFICATE OF CONFERENCE**

On March 28, 2025, I conferred with counsel for Plaintiff, regarding the relief requested in this Motion. Counsel for Plaintiff does not oppose the relief requested.

/s/ Russell D. Cawyer  
Russell D. Cawyer

**CERTIFICATE OF SERVICE**

On April 11, 2025, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Russell D. Cawyer  
Russell D. Cawyer